

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS**

INTEGRITY INVESTMENT FUND,
LLC, an Illinois limited liability
company, INTEGRITY INVESTMENT
REO HOLDINGS, LLC, an Illinois
limited liability company, SIGTELLO,
LLC, an Illinois series limited liability
company, and ABBOTT PORTFOLIO,
LLC, an Illinois limited liability
company,

Plaintiffs,

v.

KWAME RAOUL, in his official capacity
as Attorney General of the State of
Illinois; DAVID HARRIS, in his official
capacity as Director of the Illinois
Department of Revenue; et al,

Defendants.

Case No. 3:25-CV-1122-DWD

**UNOPPOSED JOINT MOTION FOR A THIRD EXTENSION
OF TIME TO RESPOND TO PLAINTFFS'
AMENDED COMPLAINT AND OTHER RELIEF**

Defendants; ADAMS COUNTY, ILLINOIS, an Illinois political subdivision unit of government; F. BRYDEN CORY, in his capacity as Treasurer of Adams County, Illinois; RYAN A. NIEKAMP, in his capacity as Clerk of Adams County, Illinois; BUREAU COUNTY, ILLINOIS, an Illinois political subdivision unit of government; JOSEPH BIRKEY, in his capacity as Treasurer of Bureau County, Illinois; MATTHEW S. EGGERS, in his capacity as Clerk of Bureau County, Illinois; CASS COUNTY, ILLINOIS, an Illinois political subdivision unit of government; TRAVIS COX, in his capacity as Treasurer of Cass County, Illinois; SHELLY WESSEL, in her capacity as Clerk of Cass County, Illinois; CHAMPAIGN COUNTY, ILLINOIS, an Illinois political subdivision unit of government; BYRON CLARK, in his capacity as Treasurer of Champaign County, Illinois; AARON AMMONS, in his capacity as Clerk of Champaign County, Illinois; CLAY COUNTY, ILLINOIS, an Illinois political subdivision unit of government; STACY ALLEN, in her capacity as Treasurer of Clay County, Illinois; AMY BRITTON, in her capacity as Clerk of Clay County, Illinois; COLES COUNTY, ILLINOIS, an Illinois political subdivision unit

of government; GEORGE E. EDWARDS, in his capacity as Treasurer of Coles County, Illinois; JULIE COE, in her capacity as Clerk of Coles County, Illinois; CRAWFORD COUNTY, ILLINOIS, an Illinois political subdivision unit of government; RIKKI CALLOWAY, in her capacity as Treasurer of Crawford County, Illinois; BECKIE STALEY, in her capacity as Clerk of Crawford County, Illinois; GRUNDY COUNTY, ILLINOIS, an Illinois political subdivision unit of government; TODD KOEHN, in his capacity as Treasurer of Grundy County, Illinois; KAY OLSON, in her capacity as Clerk of Grundy County, Illinois; HENRY COUNTY, ILLINOIS, an Illinois political subdivision unit of government; KELLY VINCENY, in her capacity as Treasurer of Henry County, Illinois; BARBARA M LINK, in her capacity as Clerk of Henry County, Illinois; JERSEY COUNTY, ILLINOIS, an Illinois political subdivision unit of government; BECCA STRANG, in her capacity as Treasurer of Jersey County, Illinois; PAM WARFORD, in her capacity as Clerk of Jersey County, Illinois; KENDALL COUNTY, ILLINOIS, an Illinois political subdivision unit of government; JILL FERKO, in her capacity as Treasurer of Kendall County, Illinois; DEBBIE GILLETTE, in her capacity as Clerk of Kendall County, Illinois; LAKE COUNTY, ILLINOIS, an Illinois political subdivision unit of government; HOLLY KIM, in her capacity as Treasurer of Lake County, Illinois; ANTHONY VEGA, in his capacity as Clerk of Lake County, Illinois; LOGAN COUNTY, ILLINOIS, an Illinois political subdivision unit of government; PENNY THOMAS, in her capacity as Treasurer of Logan County, Illinois; THERESA MOORE, in her capacity as Clerk of Logan County, Illinois; PUTNAM COUNTY, ILLINOIS, an Illinois political subdivision unit of government; KEVIN E KUNKEL, in his capacity as Treasurer of Putnam County, Illinois; TINA DULDER, in her capacity as Clerk of Putnam County, Illinois; WINNEBAGO COUNTY, an Illinois political subdivision unit of government; THERESA GRENN, in her capacity as Treasurer of Winnebago County, Illinois; LORE GUMMOW, in her capacity as Clerk of Winnebago County, Illinois; WHITESIDE COUNTY, an Illinois political subdivision unit of government; PENNY VANKAMPEN, in her capacity as Treasurer of Whiteside County, Illinois; KAREN STAROW, in her capacity as Clerk of Whiteside County, Illinois; TAZEWELL COUNTY, an Illinois political subdivision unit of government; HANNAH CLARK, in her capacity as Treasurer of Tazewell County, Illinois; JOHN ACKERMAN, in his capacity as Clerk of Tazewell County, Illinois; SANGAMON COUNTY, an Illinois political subdivision unit of government; JOE AIELLO, in his capacity as Treasurer of Sangamon County, Illinois; FRANK LESCO, in his capacity as Clerk of Sangamon County, Illinois; SHELBY COUNTY, ILLINOIS, an Illinois political subdivision unit of government; ERICA FIRNHABER, in her capacity as Treasurer of Shelby County, Illinois; JESSICA FOX, in her capacity as Clerk of Shelby County, Illinois; STARK COUNTY, ILLINOIS, an Illinois political subdivision unit of government; PAULA LEEZER, in her capacity as Treasurer of Stark County, Illinois; HEATHER HOLLIS, in her capacity as Clerk of Stark County, Illinois; ROCK ISLAND COUNTY, ILLINOIS, an Illinois political subdivision unit of government; NICK CAMLIN, in his capacity as Treasurer of Rock Island County, Illinois; KELLY FISHER, in her capacity as Clerk of Rock Island County, PIATT COUNTY, ILLINOIS, an Illinois

political subdivision unit of government; DEBBIE MARSHALL, in her capacity as Treasurer of Piatt County, Illinois; JENNIFER HARPER, in her capacity as Clerk of PIATT County, Illinois; PEORIA COUNTY, ILLINOIS, an Illinois political subdivision unit of government; BRANDEN MARTIN, in his capacity as Treasurer of Peoria County, Illinois; RACHEL PARKER, in her capacity as Clerk of Peoria County, Illinois; OGLE COUNTY, ILLINOIS, an Illinois political subdivision unit of government; TIFFANY O'BRIEN, in his capacity as Treasurer of Ogle County, Illinois; LAURA J. COOK, in her capacity as Clerk of Ogle County, Illinois; MCLEAN COUNTY, ILLINOIS, an Illinois political subdivision unit of government; REBECCA MCNEAL, in her capacity as Treasurer of McLean County, Illinois; KATHY MICHAEL, in her capacity as Clerk of McLean County, Illinois; LIVINGSTON COUNTY, ILLINOIS, an Illinois political subdivision unit of government; N. MIKKI MEIER, in her capacity as Treasurer of Livingston County, Illinois; KRISTY MASCHING, in her capacity as Clerk of Rock Island County, Illinois; LEE COUNTY, ILLINOIS, an Illinois political subdivision unit of government; PAUL RUDOLPHI, in his capacity as Treasurer of Lee County, Illinois; NANCY PETERSON, in her capacity as Clerk of Lee County, Illinois; Defendants; MONTGOMERY COUNTY, ILLINOIS, an Illinois political subdivision unit of government; NIKKI LOHMAN, in her capacity as Treasurer of Montgomery County, Illinois; SANDY LEITHEISER, in her capacity as Clerk of Montgomery County, Illinois; MOULTRIE COUNTY, ILLINOIS, an Illinois political subdivision unit of government; STEPHANIE L HELMUTH, in her capacity as Treasurer of Moultrie County, Illinois; LINDA QUALLS-BINDER, in her capacity as Clerk of Moultrie County, Illinois; VERMILION COUNTY, ILLINOIS, an Illinois political subdivision unit of government; DARREN DUNCAN, in his capacity as Treasurer of Vermilion County, Illinois; MATHEW LONG, in his capacity as Clerk of Vermilion County, Illinois; FORD COUNTY, ILLINOIS, an Illinois political subdivision unit of government; KRISHA WITCOMB in his capacity as Treasurer of Ford County, Illinois; AMY FREDERICK, in her capacity as Clerk of Ford County, Illinois; Defendants; CARROLL COUNTY, ILLINOIS, an Illinois political subdivision unit of government; LYDIA HUTCHCRAFT in her capacity as Treasurer of Carroll County, Illinois; AMY BUSS in her capacity as Clerk of Carroll County, Illinois; Defendants; BOONE COUNTY, ILLINOIS, an Illinois political subdivision unit of government; CURTIS NEWPORT in his capacity as Treasurer of Boone County, Illinois; JULIA BLISS in her capacity as Clerk of Boone County, Illinois;

Defendants; WILL COUNTY, ILLINOIS, an Illinois political subdivision unit of government; TIM BROPHY, in his capacity as Treasurer of Will County, Illinois; ANNETTE PARKER, in her capacity as Clerk of Will County, Illinois; KANKAKEE COUNTY, ILLINOIS, an Illinois political subdivision unit of government; NICHOLAS AFRICANO, in his capacity as Treasurer of Kankakee County, Illinois; DAN HENDRICKSON, in his capacity as Clerk of Kankakee County, Illinois;

Defendants; MCHENRY COUNTY, ILLINOIS, an Illinois political subdivision

unit of government; GLENDA MILLER, in her capacity as Treasurer of McHenry County, Illinois; JOSPEH TIRIO, in his capacity as Clerk of McHenry County, Illinois;

Defendants; KANE COUNTY, ILLINOIS, an Illinois political subdivision unit of government; CHRIS LAUZEN in his capacity as Treasurer of Kane County, Illinois; JOHN CUNNINGHAM, in his capacity as Clerk of Kane County, Illinois;

Defendants; HENRY COUNTY, ILLINOIS, an Illinois political subdivision unit of government; KELLY VINCENY in her capacity as Treasurer of Henry County, Illinois; BARABRA LINK in her capacity as Clerk of Henry County, Illinois;

Defendants; DUPAGE COUNTY, ILLINOIS, an Illinois political subdivision unit of government; GWEN HENRY, in her capacity as Treasurer of DuPage County, Illinois; JEAN KACZMAREK in her capacity as Clerk of DuPage County, Illinois;

Defendants; COOK COUNTY, ILLINOIS, an Illinois political subdivision unit of government; MARIA PAPPAS, in her capacity as Treasurer of Cook County; MONICA GORDON, in her capacity as Clerk of Cook County;

MARION COUNTY, ILLINOIS, an Illinois political subdivision unit of government; GARY L. PURCELL, in his capacity as Treasurer of Marion County, Illinois; STEVEN FOX, in his capacity as Clerk of Marion County, Illinois;

ST. CLAIR COUNTY, ILLINOIS, an Illinois political subdivision unit of government; ANDREW LOPINOT, in his capacity as Treasurer of St. Clair County, Illinois; THOMAS HOLBROOK, in his capacity as Clerk of St. Clair County, Illinois;

Defendants, PERRY COUNTY, ILLINOIS, an Illinois political subdivision unit of government; JODI KOESTER, in her capacity as Treasurer of Perry County, Illinois; ROBERT KELI, in his capacity as Clerk of Perry County, Illinois; JACKSON COUNTY, ILLINOIS, an Illinois political subdivision unit of government; LIZ HUNTER, in her capacity as Treasurer of Jackson County, Illinois; FRANK L. BYRD, in his capacity as Clerk of Jackson County, Illinois; WHITE COUNTY, ILLINOIS, an Illinois political subdivision unit of government; MIKE BAXLEY, in his capacity as Treasurer of White County, Illinois; KAYCI HEIL, in her capacity as Clerk of White County, Illinois; FRANKLIN COUNTY, ILLINOIS, an Illinois political subdivision unit of government; STEVE VERCELLINO, in his capacity as Treasurer of Franklin County, Illinois; KEVIN WILSON, in his capacity as Clerk of Franklin County, Illinois; MENARD COUNTY, ILLINOIS, an Illinois political subdivision unit of government; MOLLY BETTIS, in her capacity as Treasurer of Menard County, Illinois; MARTHA GUM, in her capacity as Clerk of Menard County, Illinois;

LASALLE COUNTY, ILLINOIS, an Illinois political subdivision unit of

government; JAMES L. SPELICH, in his capacity as Treasurer of LaSalle County, Illinois; JENNIFER EBNER, in her capacity as Clerk of LaSalle County, Illinois;

MORGAN COUNTY, ILLINOIS, an Illinois political subdivision unit of government; CRYSTAL MYERS, in her capacity as Treasurer of Morgan County, Illinois; SHERITY SILLS, in her capacity as Clerk of Morgan County, Illinois;

MASON COUNTY, ILLINOIS, an Illinois political subdivision unit of government; CARI B. MEEKER, in her capacity as Treasurer of Mason County, Illinois; and SUMMER BROWN, in her capacity as Clerk of Mason County, Illinois collectively known hereafter as “Defendants,” move the Court for an extension of time to respond to Plaintiff’s Amended Complaint and for other relief. In support, the moving Defendants assert as follows:

1. Plaintiffs filed their amended complaint in this matter on May 28, 2025. (Doc. 4). This case names 62 county defendants and three additional defendants per county named in their official capacities. Plaintiffs’ claims involve complex questions of constitutional law arising out of Illinois’ property tax sales and collection procedures, codified in the Property Tax Code, 35 ILCS 200/19-5 et seq. (the “PTC”),
2. Plaintiffs have not yet served all defendants.
3. Attorneys Jerome T. Murphy and Rosa M. Tumialán from Tressler LLP appeared on behalf of 33 county defendants. Counsel with Tressler LLP were recently advised that attorneys from Giffin, Winning, Cohen & Bodewes, P.C. (“Giffin”) will be representing approximately half of the counties currently represented by the Tressler firm. The need for substitution of counsel relates to the availability of a funded defense through an insurance cooperative to which some of the defendant counties are members.
4. Tressler LLP and Giffin are working diligently to coordinate the withdrawal and substitution of new counsel for these Defendants, which includes

transferring client information, attorney work product and other information necessary to the defense of this matter.

5. The moving Defendants are also in the process of obtaining and identifying client documentation and information relative to this lawsuit and to help them adequately respond to the amended complaint.

6. This Court previously extended defendants to October 22, 2025. Defendants now seek an additional extension to and including November 24, 2025 for all defendants who have been served to file responsive pleadings.

7. The requested extension will afford the moving Defendants much needed time to facilitate the substitution of counsel and to file an adequate responsive pleading as well as allow time for Plaintiffs to serve additional defendants.

8. The interests of judicial economy support an extension of time for this requested relief.

9. Ms. Tumialán from Tressler LLP communicated with Plaintiffs' counsel, David Sigale, via telephone on October 10, 2025 to seek the proposed extension. Plaintiffs' counsel advised he did not have an objection and would not oppose the motion.

10. Consistent with this Court's September 17, 2025 Order, Defendants also seek an extension through November 18, 2025 to submit a Joint Report of Parties. The current deadline of October 17, 2025 is impractical given the substitution of counsel for numerous Defendants and Plaintiffs' ongoing efforts to serve all

defendants. The requested extension will allow the parties time to better assess any anticipated motion practice and discovery in this matter.

11. This motion is brought in good faith and without the intention of causing delay or prejudice to any party. This motion is the third request for an extension of time.

WHEREFORE, the undersigned Defendants, through their undersigned counsel, respectfully request this Court to extend the deadline by which they must respond to Plaintiffs' Amended Complaint, through November 24, 2025, and to extend the deadline to submit a Joint Report of Parties to November 18, and for all other just and proper relief.

Respectfully submitted,

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Defendants*

/s/Matthew Trapp

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CERTIFICATE OF SERVICE

A copy of the foregoing document will be served via the CM/ECF system to all attorneys of record on the 16th day of October, 2025.

/s/ Diane B. Novosel

[x] Under penalties as provided by law pursuant to 735 ILCS 5/1-109, I certify that the statements set forth herein as true and correct.